

ORIGINAL

**FILED**  
DISTRICT COURT OF GUAM

JUL 17 2007 mbe

MARY L.M. MORAN  
CLERK OF COURT

1 Elibosang.CPL

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9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE TERRITORY OF GUAM**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSEPH U.R.M. ELIBOSANG,

15 Defendant.

CRIMINAL CASE NO.

**07-00062**

**COMPLAINT**

**THEFT OF GOVERNMENT PROPERTY**  
[18 U.S.C. § 641]

16  
17 THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF  
18 THAT:

19 On or about July 2, 2007, in the District of Guam, the defendant herein, JOSEPH U.R.M.  
20 ELIBOSANG, did unlawfully and knowingly steal, purloin and convert to his use or the use of  
21 another, and did without authority sell, convey and dispose of, a thing of value belonging to the  
22 United States and a department and agency thereof, to-wit: metal plates, the property of the U.S.  
23 National Park Service, said metal plates having a value of more than \$1,000,

24 ALL IN VIOLATION of Title 18, United States Code, Section 641.

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1 COMPLAINT FURTHER STATES:

2 1. I, WILLIAM C. KLINE, JR., am a Special Agent employed by the Federal Bureau of  
3 Investigation, and make this affidavit in my official capacity. I have reviewed reports written by  
4 Guam Police Officers (GPD) B.A.C. Santos, Joseph Mansapit, and other GPD officers, and have  
5 conducted my own investigation as well. Based on the reports generated from the Guam Police  
6 Department, the following has occurred:

7 2. On July 5, 2007, an employee of the U.S. Department of the Interior National Park  
8 Service, Rose S.N. Manibusan, contacted the Guam Police Department to report the theft of  
9 thirty-four (34) bronze name plates which had been secured to the wall of the Asan Overlook of  
10 the War in the Pacific National Park. These name plates bore the names of Guam citizens and  
11 U.S. service men and women who had lost their lives during World War II, and were the property  
12 of the United States National Park Service, an agency of the United States.

13 3. Acting on this information, GPD officers distributed flyers describing these plates to  
14 metal scrap yard on Guam. On July 6, 2007, GPD officials received information from an  
15 informant that several of the pieces of the brass plates were sold to Xiong's Family Recycling.  
16 Officers went to Xiong's and ultimately recovered seven (7) of the plates which had been stolen  
17 from the Asan Overlook.

18 4. According to Xiong's Family Recycling records, the person selling these plates on July  
19 2, 2007, provided a vehicle registration receipt for a 1993 Toyota Tercel, GLP # DED177A,  
20 which was registered to Valerie Ngirdimau. Ms. Ngirdimau was contacted later that day, and  
21 said that her uncle, Henry Eligosang, has had possession of the Tercel for several months. GPD  
22 officers contacted Mr. Eligosang, who said that his nephew Joseph Elibosang was driving the  
23 vehicle.


24 5. Later on July 6, Joseph Elibosang was located and requested to come to the Criminal  
25 Investigations Section of GPD for questioning. After being advised of his rights, Elibosang

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1 admitted selling these plates, and others, to Xiong's Family Recycling. He admitted he had sold  
2 approximately 23 of the brass plates beginning on or about June 26, 2007.

3 6. I have talked to National Park Service Special Agent Niel Okana, who advises me that  
4 he believes the plates are worth as much as <sup>#1,700 each</sup> ~~\$10,000~~ each.

5 FURTHER AFFIANT SAYETH NAUGHT.

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7   
8 WILLIAM C. KLINE, JR.  
9 Special Agent  
Federal Bureau of Investigation

10 SUBSCRIBED AND SWORN to before me on this 17 day of July, 2007.

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13 ANITA A. SUKOLA  
14 Designated Judge  
District Court of Guam  
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